

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**CARLOS A. GARCIA PEREZ, ET AL**

**Plaintiffs**

**vs.**

**ALVARO SANTAELLA, M.D., ET AL**

**Defendants**

**CIVIL NO. 97-1703 (JAG)**

**JURY TRIAL DEMANDED**

**MOTION FOR EXTENSION OF TIME WITHIN WHICH TO  
FILE OPPOSITION TO MOTION FOR SUMMARY JUDGMENT**

**TO THE HONORABLE COURT:**

Comes now codefendant, American International Insurance Company of Puerto Rico, Inc., hereinafter AIICO, through the undersigned attorneys and respectfully states and prays as follows:

1. The Parties have been engaged in ongoing settlement negotiations and there is currently a settlement conference scheduled to take place on May 2, 2005 at 5:00 PM.
2. As a practical matter, any settlement of this case will render the legal issues raised in Plaintiffs motion for summary judgment moot. Furthermore, at this juncture, it is our firm belief that all efforts and resources of the parties should be geared towards settlement of the present action.
3. In order to conserve resources and avoid the expenditure of unnecessary costs,

the appearing party requests that the opposition to Plaintiffs motion for summary judgment be held in abeyance until a brief time after the settlement conference set for May 2, 2005.

4. To this end, we propose that a brief extension of ten (10) days after the settlement conference of May 2, 2005 be allowed for the appearing party to file it's opposition to Plaintiffs motion for summary judgment. The requested extension of time would expire on May 13, 2005.

**WHEREFORE**, it is respectfully requested that the Honorable Court take notice of this Motion and grant the appearing party a brief extension of ten (10) days after the settlement conference of May 2, 2005 be allowed for the appearing party to file it's opposition to Plaintiffs motion for summary judgment. The requested extension of time would expire on May 13, 2005.

**I Hereby Certify** that on April 29, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Andres Guillemard Noble, Esq., Joan S. Peters, Esq., Pedro J. Cordova, Esq., Angel R. De Corral Juliá, Esq., Marta E. Vilá Báez, Esq., Roberto Ruiz Comas, Esq., José Enrique Otero, Esq., José Hector Vivas, Esq., Igor J. Dominguez, Esq., Doris Quiñones Tridas, Esq., and Pedro Toledo González, Esq.

**Respectfully Submitted** in San Juan, Puerto Rico on this 29<sup>th</sup> of April, 2005.

**S/ JEANNETTE LOPEZ DE VICTORIA**  
**JEANNETTE LÓPEZ DE VICTORIA**  
**BAR NUMBER 205101**

**S/ ISABEL GUILLEN BERMUDEZ**  
**BAR NUMBER 214206**

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